

1 Counsel listed on the following page.  
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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT  
12 SAN FRANCISCO DIVISION

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14 PETER WRIGHT and MICHELLE  
15 TRAME, individually, on behalf of all  
16 others similarly situated, and on behalf of  
17 the general public,  
18

Plaintiffs,

19 vs.  
20

ADVENTURES ROLLING CROSS  
COUNTRY, INC., dba ADVENTURES  
CROSS COUNTRY (ARCC), a California  
Corporation, SCOTT VON ESCHEN, and  
DOES 1 through 50 inclusive,

21 Defendants.  
22

Case No. 3:12-cv-00982-EMC

**STIPULATION TO CONTINUE  
DEADLINE FOR JOINT  
SUPPLEMENTAL BRIEF**

**Judge:** Edward M. Chen  
**Ctrm:** 5, 17th Floor

Current Deadline: July 15, 2013  
Proposed Deadline: July 22, 2013

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*SCOTT VON ESCHEN*

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1 TO THE COURT:

2 Plaintiffs PETER WRIGHT and MICHELLE TRAME (“Plaintiffs”) and Defendants  
3 ADVENTURES ROLLING CROSS COUNTRY, INC., and SCOTT VON ESCHEN  
4 (“Defendants”), by and through their respective counsel of record, herein agree and stipulate as  
5 follows:

6 **RECITALS**

7 1. The Court has required that the parties meet and confer and file a joint  
8 supplemental brief regarding the proposed class notice and consent form by July 15, 2013 (ECF  
9 Doc. 134);

10 2. The parties are actively engaged in settlement discussions on issues that impact the  
11 contents of the joint supplemental brief;

12 3. The parties respectfully request more time to meet and confer on the issues raised  
13 by the Court in its Order dated July 8, 2013;

14

15 **STIPULATION**

16 NOW, THEREFORE, based upon the foregoing statements, Plaintiffs and Defendants  
17 hereby agree and stipulate as follows, subject to Court approval, that the deadline to file a joint  
18 supplemental brief regarding the proposed class notice and consent form be continued to **July 22,**  
19 **2013.**

20 IT IS SO STIPULATED:

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1 Dated: July 12, 2013

HIRSCHFELD KRAEMER LLP

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By: /s/ Kristin L. Oliveira

Reed E. Schaper

Kristin L. Oliveira

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Attorneys for Defendants

ADVENTURES ROLLING CROSS  
COUNTRY, INC., dba ADVENTURES  
CROSS COUNTRY (ARCC) and SCOTT  
VON ESCHEN

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Dated: July 12, 2013

BRYAN SCHWARTZ LAW  
RUDY EXELROD ZIEFF & LOWE, LLP

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By: /s/ Bryan J. Schwartz

Bryan J. Schwartz

Attorneys for Plaintiffs

PETER WRIGHT and MICHELLE TRAME

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1 [PROPOSED] ORDER  
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3 Pursuant to the parties' Joint Stipulation, it is so ordered that the deadline for the Parties to  
4 file a joint supplemental brief regarding the proposed class notice and consent form be extended  
5 to July 22, 2013. July 19, 2013 by 4:00 p.m.  
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7 Dated: July 15, 2013  
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